

JAMES E. SMYTH II
Nevada Bar No. 6506
LISA J. ZASTROW
Nevada Bar No. 9727
KAEMPFER CROWELL
8345 West Sunset Road, Suite 250
Las Vegas, Nevada 89113
Telephone: (702) 792-7000
Facsimile: (702) 796-7181
jsmyth@kcnvlaw.com
lzastrow@kcnvlaw.com

Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

VIRGINIA MITSCHKE, Individually, as
surviving heir, and as Co-Administrator of the
Estate of RICHARD DARNELL, Decedent,

Plaintiff,

vs.

GOSAL TRUCKING, LTD., a Canadian
corporation; CANADIAN WESTERN
BANK, a Canadian corporation; SAMIMI
SAEED, Individually; DOES I through X;
and ROE CORPORATIONS I through X,

Defendants.

Case No. 2:14-cv-01099-JCM-VCF

**STIPULATION AND ORDER TO
EXTEND TIME FOR PLAINTIFFS TO
FILE RESPONSE TO DEFENDANTS'
MOTION FOR PROTECTIVE ORDER
REQUESTING STAY OF HIS
DEPOSITION AND DISCOVERY
RESPONSES PENDING RESOLUTION
OF HIS CRIMINAL TRIAL
(DOCUMENT 082)**

(FIRST REQUEST)

VIRGINIA MITSCHKE ("Plaintiff"), by and through her counsel Kaempfer Crowell and Defendants GOSAL TRUCKING, LTD. and SAMIMI SAEED, by and through their counsel ALVERSON, TAYLOR, MORTENSEN & SANDERS, hereby respectfully submit this Stipulation And Order To Extend Time For Plaintiffs To File Response To Defendants' Motion For Protective Order Requesting Stay Of His Deposition And Discovery Responses Pending Resolution Of His Criminal Trial (Document 082) (First Request) (the "Stipulation"). This Stipulation is made in accordance with LR 6-1, LR 6-2, and LR 7-1 of the Local Rules of

1 this Court. This is the first request for an extension of time to file Plaintiffs' Response To
2 Defendants' Motion For Protective Order Requesting Stay Of His Deposition And Discovery
3 Responses Pending Resolution Of His Criminal Trial (Document 082) (Plaintiffs' "Response").

4 This Stipulation is entered into at the request of counsel for Plaintiff who respectfully
5 represents that counsel has been working diligently and in good faith to meet the deadline for
6 the filing of Plaintiff's Response, however, despite counsel's best efforts, additional time is
7 needed for preparation of the Response.

8 The basis of this request has been discussed with counsel for Defendants Samimi Saeed
9 and Gosal Trucking, Ltd., who has no objection to the requested extension of four (4) days, up
10 to and including **June 12, 2015**, within which to file Plaintiff's Response.

11 This Stipulation is presented in good faith and not for the purpose of delay.

12 This is Plaintiffs' first request for an extension of time to file Plaintiffs' Response.

13 IT IS SO STIPULATED.

14 DATED this 8th day of June, 2015.

15 KAEMPFER CROWELL

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17 BY: /s/Lisa J. Zastrow

JAMES E. SMYTH II (Nevada Bar No. 6506)
LISA J. ZASTROW (Nevada Bar No. 9727)
8345 West Sunset Road, Suite 250
Las Vegas, Nevada 89113
Attorneys for Plaintiffs

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1 DATED this 8th day of June, 2015.

2 ALVERSON, TAYLOR, MORTENSEN & SANDERS

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4 BY: /s/Sabrina G. Wibicki
5 NATHAN R. REINMILLER, ESQ.
6 SABRINA G. WIBICKI, ESQ.
7 7401 W. Charleston Blvd.
8 Las Vegas, NV 89117
9 *Attorneys for Gosal Trucking, Ltd. and*
10 *Saeed Samimi*

11 **ORDER**

12 **IT IS SO ORDERED:**

13 

14 United States Magistrate Judge

15 DATED this 15th day of June, 2015.

CERTIFICATE OF ELECTRONIC SERVICE

I hereby certify that service of the foregoing **STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFFS TO FILE RESPONSE TO DEFENDANTS' MOTION FOR PROTECTIVE ORDER REQUESTING STAY OF HIS DEPOSITION AND DISCOVERY RESPONSES PENDING RESOLUTION OF HIS CRIMINAL TRIAL (DOCUMENT 082) (FIRST REQUEST)** was made this date by electronic means through the Court's CM/ECF program to each of the following:

Nathan R. Reinmiller, Esq.
Sabrina G. Wibicki, Esq.
ALVERSON, TAYLOR,
MORTENSEN & SANDERS
7401 W. Charleston Blvd.
Las Vegas, NV 89117
*Attorneys for Gosal Trucking, Ltd.
and Saeed Samimi*

DATED this ___ day of June, 2015.

an employee of Kaempfer Crowell